

Exhibit C

records contained Medical Run Reports and other emergency response documents, but only if an internal investigation of the emergency response had taken place.

3. Attached hereto as Exhibit 1 is a true and correct copy of an April 9, 2007 letter I sent to counsel for the City and the Defendants, Peter Stackpole.

4. Attached hereto as Exhibit 2 is a true and correct copy of an April 23, 2007 letter I sent to Mr. Stackpole.

5. Not having received a response to either my April 9, 2007 letter or my April 23, 2007 letter, I called Mr. Stackpole on April 27, 2007. In that conversation, Mr. Stackpole indicated that he intended to produce the remaining documents responsive to the September 2006 Subpoena but would not state when he believed such production would be completed.

6. On May 18, 2007, I met with Mr. Stackpole at the Office of Internal Investigations to review additional documents. On that occasion, I provided Mr. Stackpole a list entitled "Additional Documents to Be Produced Pursuant to September 14, 2006 Subpoena, as of May 18, 2007." A true and correct copy of that list is attached hereto as Exhibit 3. Mr. Stackpole again indicated that the remainder of the requested documents would be produced.

7. Attached hereto as Exhibit 4 is a true and correct copy of a May 22, 2007 letter I sent to Mr. Stackpole.

8. Attached hereto as Exhibit 5 is a true and correct copy of a June 8, 2007 e-mail I received from Mr. Stackpole.

9. Attached hereto as Exhibit 6 is a true and correct copy of a series of e-mails between Mr. Stackpole and myself exchanged on June 13, 2007 and June 15, 2007, without the attachment.

10. Attached hereto as Exhibit 7 is a June 20, 2007 e-mail I sent to Mr. Stackpole.

11. Ms. Jacobson and I understood during the June 21, 2007 telephone status conference that the City still intended to produce the remainder of the documents by July 2, 2007, the date identified in the parties' June 15, 2007 Joint Status Report. It was on that basis that we believed we would have sufficient time to prepare for the summary judgment deadline and trial set during that conference.

12. Attached hereto as Exhibit 8 is a true and correct copy of a June 21, 2007 letter I sent to Mr. Stackpole.

13. Attached hereto as Exhibit 9 is a true a correct copy of a series of e-mails among Ms. Jacobson, Mr. Stackpole, and myself exchanged on June 25, 2007.

14. Attached hereto as Exhibit 10 is a true and correct copy of a June 26, 2007 5:00 PM e-mail Mr. Stackpole sent to Ms. Jacobson, without the attachment.

15. Attached hereto as Exhibit 11 is a true and correct copy of a June 26, 2007 4:17 PM e-mail Mr. Stackpole sent to Ms. Jacobson, without the attachment.

16. Attached hereto as Exhibit 12 is a true and correct copy of a June 27, 2007 letter Ms. Jacobson sent to Mr. Stackpole, with attachments entitled "Documents Produced by the City Pursuant to September 14, 2006 Subpoena" and "Additional Documents to Be Produced as of June 27, 2007."

17. Attached hereto as Exhibit 13 is a true and correct copy of an August 8, 2007 letter Ms. Jacobson sent to Mr. Stackpole.

18. On August 30, 2007, I called Mr. Stackpole to coordinate production of the documents Defendants were to produce on August 31, 2007. Mr. Stackpole informed me for the first time during that conversation that Defendants would be producing a master list of their work schedules and microfiche tapes on which Plaintiffs could locate responsive documents based on


when the Defendants worked. When I picked up the microfiche tapes and the few documents produced on August 31, 2007, Mr. Stackpole informed me that the reason Defendants produced the microfiche tapes rather than the documents requested was that it would take "many months" to obtain hard copies of those documents from the tapes.

19. Attached hereto as Exhibit 14 is a chart entitled "Court Order US District Court Judge Michael R. Barrett" produced by Defendants on August 31, 2007.

20. Attached hereto as Exhibit 15 is a chart entitled "Work Schedule 5/29/1999-7/29/2000 Mike Lotz and Steve Hoog" produced by Defendants on August 31, 2007.

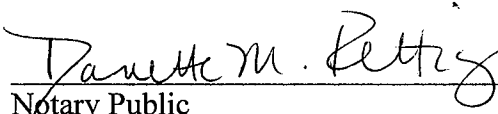
21. We have hired a college student to print responsive documents from the microfiche at the public library. The following was reported to me by the student: The microfiche tapes include Medical Run Reports for the entire Fire Department and are not organized by fire house or engine or ambulance number. There are approximately a hundred documents per day. The reader does not operate while a document prints, so the student must wait to begin scrolling for the next responsive document. It takes approximately 30 to 40 minutes to identify and print the responsive documents for a single day.

Further Affiant sayeth naught.


Dorothea Langsam

Sworn to before me and subscribed in my presence this 19th day of September, 2007.

DANETTE M. RETTIG
Notary Public, State of Ohio
My Commission Expires March 11, 2011


Notary Public

Langsam Affidavit Exhibit 1

Vorys, Sater, Seymour and Pease LLP

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Dorothea K. Langsam
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E-Mail - dklangsam@vssp.com

April 9, 2007

Peter J. Stackpole, Esq.
City of Cincinnati Solicitor's Office
801 Plum Street, Room 214
Cincinnati, OH 45202

Re: *Samuel v. Hoog*
City of Cincinnati's Responses to Subpoena for Records

Dear Peter:

It was a pleasure meeting you last week. This letter is to follow up on the City's Responses to Plaintiffs' Subpoena for Records.

Plaintiffs' first request sought all Medical Run Reports for the period May 29, 1999 through July 29, 2000 that identify by name or badge number either Firefighter Hoog or Lotz. The City has produced only Medical Run Reports for the 1316 Burdett Avenue location. Plaintiffs therefore still need to obtain the vast majority of documents responsive to this request.

Plaintiffs' second request sought all documents related to the May 29, 2000 incident. The City has provided some responsive documents. Please also produce all drafts of disciplinary reports concerning Firefighters Hoog and Lotz and any Form-47's and Form-273's.

Plaintiffs' fourth request asked for all Medical Run Reports, Form-33's, Form-34's, and "desk diaries" for the period January 1, 2000 through July 29, 2000 when Firefighter Hoog was on duty. The City has produced only Medical Run Reports and Form-34's to the 1316 Burdett location. In addition to Medical Run Reports and Form-34's for other addresses, Plaintiffs also need to obtain desk diaries (including the "red diary" maintained at station houses and the daily "Unit History" documents). If there are no other existing diaries for this time period, please let us know. If any such documents have been destroyed, please let us know when the destruction occurred.

Vorys, Sater, Seymour and Pease LLP

Peter J. Stackpole, Esq.
April 9, 2007
Page 2

Plaintiffs' fifth request was for all documents relating to emergency responses to 1316 Burdett Avenue. The City produced some responsive documents. Please provide complete "Address Inquiry – Incidents" and "Incident Report" printouts, Medical Run Reports, CAD's, and Form-34's for all emergency responses to 1316 Burdett Avenue. The City also objected on attorney-client privilege and work product grounds. Please provide a privilege log describing the documents that the City is reserving on either of those grounds, with sufficient detail to permit us to evaluate the claim for privilege.

Plaintiffs' sixth request sought documents relating to any allegation that Firefighter Hoog or Lotz acted in a rude, racist, unprofessional, or negligent manner, or violated any law, regulation, or policy. The City responded that there are no such records. Please confirm that, other than the records already produced related to the incident giving rise to this case, there are no such records.

Plaintiffs' eighth request asked for documents related to Firefighter Hoog's performance of duties as officer in charge of Engine 23. The City responded that there are no such records. Please provide copies of all "In Charge Exams" taken by Firefighter Hoog and any related documents. Please also confirm that, other than on May 29, 2000, Officer Hoog never served as officer in charge of Engine 23 and therefore that there are no other documents (such as Medical Run Reports, CAD's, or Form-34's) related to his performance of those duties.

Plaintiffs' fourteenth request was for documents showing the dates and hours that Firefighters Hoog and Lotz were on duty with Engine 23 for the period January 1, 2000 through July 29, 2000. The documents provided by the City (with the heading "work schedule as it appears in the AS/400") indicate that the date is in year "1." Please confirm that the year referred to is 2000.

Plaintiffs' seventeenth request sought documents related to the racial makeup of fire houses or engine companies. The City stated that it provided such records. None of the documents produced, however, pertain to racial makeup at any fire house or engine company. Please provide responsive documents.

Plaintiffs' nineteenth request asked for documents showing the neighborhood or geographic area primarily served by Engine 23 from 1995 to the present. The City produced a document that states that the community served by Station 23 is Walnut Hills. If there are any documents that more specifically define the geographic area served by Engine 23, please produce them.

Plaintiffs' twentieth request asked for Firefighter Hoog's and Lotz's personnel files. Please produce those files.

Also, as we discussed, please provide us with a copy of the back of the Medical Run Report (preferably, a two-sided copy). And, finally, please let me know when you will be available to complete the review of documents at the Longworth Building and to review

Vorys, Sater, Seymour and Pease LLP

Peter J. Stackpole, Esq.
April 9, 2007
Page 3

documents maintained by Rescue 1 and 2. For all of the documents requested, we are willing to coordinate the production of the requested information to minimize any inconvenience.

Thank you for your attention to these matters.

Very truly yours,


Dorothea K. Langsam

DKL/lma

Langsam Affidavit Exhibit 2

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Dorothea K. Langsam
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April 23, 2007

Peter J. Stackpole, Esq.
City of Cincinnati Solicitor's Office
801 Plum Street, Room 214
Cincinnati, OH 45202

Re: *Samuel v. Hoog*
City of Cincinnati's Responses to Subpoena for Records

Dear Peter:

This letter is to follow up on my letter to you of April 9, 2007, concerning the City's response to Plaintiffs' subpoena for records. As you know, we have a status conference report due to the Court on May 2, and I would very much like to have received the additional requested documents before we report to the Court.

I am available this Wednesday through Friday, April 25-27, to review documents maintained at the Longworth Building and Rescue 1 and 2. Please let me know your availability on those days. I also assume that you will be producing additional documents directly to our office. Please let me know when we can expect to receive them, and if there is anything we can do to expedite the production. Finally, I raised several questions in my last letter concerning the City's response to date, and would appreciate your response to those questions.

Thank you for your timely attention to these matters.

Very truly yours,



Dorothea K. Langsam

DKL/lma

Langsam Affidavit Exhibit 3

**ADDITIONAL DOCUMENTS TO BE PRODUCED
PURSUANT TO SEPTEMBER 14, 2006 SUBPOENA,
AS OF MAY 18, 2007**

Medical Run Reports for May 29, 1999 through July 29, 2000 that identify by name or badge number either Firefighter Hoog or Lotz. (First Request.)

Medical Run Reports, Forms 33, Forms 34, and desk diaries (including “red diaries” and “Unit History” documents) for the period January 1, 2000 through July 29, 2000 when Firefighter Hoog was on duty. (Fourth Request.)

Additional documents, including Medical Run Reports, CAD’s, and Forms 34, for any occasion Firefighter Hoog acted as the officer in charge. (Eighth Request.)

Additional documents related to May 29, 2000 incident, including Forms 47, Forms 273, and the back of the Medical Run Report. (Second Request.)

Medical Run Reports, CAD’s, Forms 34, “Address-Inquiry – Incidents” and “Incident Report” printouts for all emergency responses to 1316 Burdett Avenue at any time. (Fifth Request.)

Drafts of disciplinary Firefighter Hoog and Lotz disciplinary reports. (Second Request.)

Firefighter Hoog’s and Lotz’s personnel files. (Twentieth Request.)

Documents related to the racial makeup of fire houses or engine companies. (Seventeenth Request.)

A map of the geographic area primarily served by Engine 23, or a description of its boundaries. (Nineteenth Request.)

Langsam Affidavit Exhibit 4

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Dorothea K. Langsam
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May 22, 2007

Peter J. Stackpole, Esq.
City of Cincinnati Solicitor's Office
801 Plum Street, Room 214
Cincinnati, OH 45202

Re: *Samuel v. Hoog*
City of Cincinnati's Response to Subpoena

Dear Peter:

I am available tomorrow, Wednesday, May 23, and any day next week, May 28-31, with the exception of Tuesday morning, to review the remaining documents at the Longworth Building. Please let me know if we can complete the review at any of these times. Also, please let me know when I can expect to receive the additional documents responsive to the September 14, 2006 subpoena.

Thank you for your attention to these matters.

Very truly yours,


Dorothea K. Langsam

DKL/lma

Langsam Affidavit Exhibit 5

Langsam, Dorothea K.

From: Stackpole, Peter [Peter.Stackpole@cincinnati-oh.gov]
Sent: Friday, June 08, 2007 10:23 AM
To: Langsam, Dorothea K.
Subject: RE: Samuel v Hoog

Thea,

Just wanted to give you an update. I have farmed out your primary document requests to three different people within the Fire Department. They are Assistant Chief Mose Demasi (Human Resources), Maria Menke-Sunderhaus (accounting supervisor—apparently her department handles medical records), and District Chief Roy Winston (Dispatch) who should be able to get us a map of the E23 service area. When I have any information back from these folks, I will provide it to you.

Thanks,
Peter

From: Langsam, Dorothea K. [mailto:dklangsam@vssp.com]
Sent: Tuesday, May 29, 2007 1:23 PM
To: Stackpole, Peter
Subject: RE: Samuel v Hoog

Great, thanks.

From: Stackpole, Peter [mailto:Peter.Stackpole@cincinnati-oh.gov]
Sent: Tuesday, May 29, 2007 1:22 PM
To: Langsam, Dorothea K.
Subject: FW: Samuel v Hoog

Thea –

See you Friday at 10am.

Thanks,
Pete

From: Ransick, Richard
Sent: Tuesday, May 29, 2007 10:37 AM
To: Stackpole, Peter
Cc: Wilson, Laura A
Subject: RE: Samuel v Hoog

That's fine. Lt. Johnson and I will not be available but Laura Wilson will be here.

rpr

-----Original Message-----

From: Stackpole, Peter
Sent: Tuesday, May 29, 2007 9:49 AM
To: Ransick, Richard
Subject: Samuel v Hoog

9/17/2007

Thea (opposing counsel) would like to finish her review of the IIS records this Friday at 10am. Can we do that?

Thanks,
Pete

From the law offices of Vorys, Sater, Seymour and Pease LLP.

IRS CIRCULAR 230 DISCLOSURE: In order to ensure compliance with requirements imposed by the U.S. Internal Revenue Service, we inform you that any federal tax advice contained in this communication (including any attachments) is not intended or written to be used, and it cannot be used, by any taxpayer for the purpose of (i) avoiding penalties that may be imposed under the U.S. Internal Revenue Code or (ii) promoting, marketing, or recommending to another person, any transaction or other matter addressed herein.

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9/17/2007

Langsam Affidavit Exhibit 6

Langsam, Dorothea K.

From: Stackpole, Peter [Peter.Stackpole@cincinnati-oh.gov]
Sent: Friday, June 15, 2007 11:31 AM
To: Langsam, Dorothea K.
Subject: RE: Proposed Joint Status Report

Thanks Thea. Mose Demasi is on vacation this week and won't return until Monday. He is the key person in CFD human resources who can tell me how long it will take to get the requested information. I tried his underlings but they deferred to Chief Demasi. As a result, I can only give you my best guess on the date. Let's say July 2. If Mose gets back and tells me I am being unrealistic I will let you know.

Otherwise the report is fine. Thanks.

From: Langsam, Dorothea K. [mailto:dklangsam@vssp.com]
Sent: Friday, June 15, 2007 11:25 AM
To: Stackpole, Peter
Subject: RE: Proposed Joint Status Report

Peter,

I just wanted to remind you that the status report is due today. Please let me know the date by which you expect to produce the documents and that you agree to the proposed report.

Thanks,

Dorothea (Thea) Langsam, Esq.
Vorys, Sater, Seymour and Pease LLP
Suite 2000, Atrium Two
221 East Fourth Street
Cincinnati, OH 45202
Direct dial: (513) 723-4094
Direct fax: (513) 852-7858
dklangsam@vssp.com

From: Stackpole, Peter [mailto:Peter.Stackpole@cincinnati-oh.gov]
Sent: Wednesday, June 13, 2007 12:12 PM
To: Langsam, Dorothea K.
Subject: RE: Proposed Joint Status Report

I've sent out emails to CFD re the documents you've requested. Chief Demasi is out, but I emailed a subordinate. I will let you know the date by which we expect to have documents available shortly.

Thanks.

From: Langsam, Dorothea K. [mailto:dklangsam@vssp.com]
Sent: Wednesday, June 13, 2007 12:03 PM
To: Stackpole, Peter

9/17/2007

Subject: Proposed Joint Status Report

Peter,

Attached is a proposed Joint Status Report. It is due Friday. I have left for you to fill in the date by which the City expects to produce the remainder of the subpoenaed documents. Please also let me know if you would like any revisions made and e-mail it back to me.

Thanks,

Dorothea (Thea) Langsam, Esq.
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From the law offices of Vorys, Sater, Seymour and Pease LLP.

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From the law offices of Vorys, Sater, Seymour and Pease LLP.

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9/17/2007

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9/17/2007

Langsam Affidavit Exhibit 7

Langsam, Dorothea K.

From: Langsam, Dorothea K.
Sent: Wednesday, June 20, 2007 10:05 AM
To: Stackpole, Peter
Subject: Samuel v. Hoog

Peter,

As I mentioned to you, the City's document production included some but not all of the requested forms for responses to 1316 Burdett Ave other than on May 29, 2000. For your convenience, the following is a list of the forms we have *not* received:

9/23/95 Incident 2660010 -- Form 33 (Medical Run Report), Form 34 (Daily Emergency Medical Services Company Report), CAD
10/29/97 Incident 3020053 -- CAD
7/4/98 Incident 1850141 -- CAD
8/16/98 Incident 2280039 -- CAD
8/26/98 Incident 2380114 -- Form 33, Form 34, CAD
12/18/98 Incident 3520178 -- Form 34, CAD
1/9/99 Incident 0090148 -- Form 33, Form 34, CAD
2/8/99 Incident 0390100 -- Form 33, Form 34, CAD
5/12/99 Incident 1320196 -- Form 33, Form 34, CAD
11/13/99 Incident 3170132 -- Form 34, CAD
1/16/00 Incident 0160164 -- CAD
4/23/03 Incident 1130146 -- Form 33, Form 34, CAD
1/7/05 Incident 70050 -- Form 33, Form 34, CAD
5/12/05 Incident 320154 -- Form 33, Form 34, CAD
6/18/05 Incident 690028 -- Form 33, Form 34, CAD
8/11/05 Incident 230152 -- Form 33, Form 34, CAD
12/2/05 Incident 360151 -- Form 33, Form 34, CAD
3/16/06 Incident 750091 -- Form 33, Form 34, CAD
3/18/06 Incident 770147 -- Form 33, Form 34, CAD

As you know, we also have not yet received any of the requested forms for incidents at locations other than 1316 Burdett Ave. I assume you are still anticipating producing these and the other remaining documents on July 2.

Thank you,

Dorothea (Thea) Langsam, Esq.
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Langsam Affidavit Exhibit 8

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Dorothea K. Langsam
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June 21, 2007

VIA REGULAR U.S. MAIL & E-MAIL

Peter J. Stackpole, Esq.
City of Cincinnati Solicitor's Office
801 Plum Street, Room 214
Cincinnati, OH 45202

Re: *Samuel v. Hoog*
City of Cincinnati's Response to Subpoena

Dear Peter:

This letter will confirm that the City of Cincinnati will produce the remainder of the subpoenaed documents by July 2, 2007. We understand that although you will be on vacation June 29 through July 6, this will not interfere with your ability to produce the documents to us no later than July 2. If there is anything we can do to assist with this process, please let me know.

Very truly yours,


Dorothea K. Langsam

DKL/lma

cc: Kimberly A Rutowski

Langsam Affidavit Exhibit 9

Langsam, Dorothea K.

From: Stackpole, Peter [Peter.Stackpole@cincinnati-oh.gov]
Sent: Monday, June 25, 2007 4:46 PM
To: Jacobson, Barbara Bison; Langsam, Dorothea K.
Subject: RE: Samuels v. Hoog

I am meeting with Mose Demasi tomorrow at 11am. He is going to go over the document requests and explain what they can and can't do, and how long it will take. It may be that we will take you up on the offer of having assistance with the records. I mentioned to Mose that I may also want him to explain to you and, if necessary Judge Barrett, the complications with obtaining some of the records you've requested. Mose has a different take on the records than Maria. He believes that finding the specific information you have requested may well be like searching for a needle in a haystack. The problem is, as I understand it, there was no computer system in which data was stored until the last few years. Prior to that, the records were all kept by hand. We are talking many thousands of runs and each one would have to be pulled by hand and read by a person to ascertain if the desired information is present. On top of that, unless I am missing something—and I don't pretend to be an expert on HIPAA law—you will have to obtain a HIPAA release for every single person whose medical information you are obtaining, which would also potentially be many, many thousands.

Thanks,
 Peter

From: Jacobson, Barbara Bison [mailto:bbjacobson@vssp.com]
Sent: Monday, June 25, 2007 4:07 PM
To: Stackpole, Peter; Langsam, Dorothea K.
Subject: RE: Samuels v. Hoog

Peter: We need the material right now. If you can't have it by July 2nd, when is your absolute, I know I can have it, no delays, date? I will agree with such a date, if it is very soon after July 2nd, If not, we will have to get back on the phone to Judge Barrett. Let me know after you have consulted with your people. Again, if you need bodies to review records, let me know. Barbara

From: Stackpole, Peter [mailto:Peter.Stackpole@cincinnati-oh.gov]
Sent: Monday, June 25, 2007 2:37 PM
To: Jacobson, Barbara Bison; Langsam, Dorothea K.
Subject: Samuels v. Hoog

Barb and Thea,

By way of update, I've touched base with Maria Menke-Sunderhaus. She is helping me navigate through the CFD records and locate the outstanding items. The personnel files should be no trouble to obtain, but may take some time to copy. She is going to try to get a limited duty firefighter to do the copying. You should also know that the personnel jacket will not contain the individual firefighters' sick with pay files and personal medical information. Those files are kept separately and if you believe you need their personal medical information we will require a court order. For the F33s you've requested, apparently a lot of the material is on microfiche. The good news is that, according to Maria, the City should be able to get even the oldest records you have requested. But I may not be able to get the F33s to you by July 2, particularly since my vacation begins June 29.

I am awaiting an email from Maria either today or tomorrow am with a time estimate. I will have more information either later today or tomorrow morning.

Thanks,
 Peter

9/17/2007

From the law offices of Vorys, Sater, Seymour and Pease LLP.

IRS CIRCULAR 230 DISCLOSURE: In order to ensure compliance with requirements imposed by the U.S. Internal Revenue Service, we inform you that any federal tax advice contained in this communication (including any attachments) is not intended or written to be used, and it cannot be used, by any taxpayer for the purpose of (i) avoiding penalties that may be imposed under the U.S. Internal Revenue Code or (ii) promoting, marketing, or recommending to another person, any transaction or other matter addressed herein.

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9/17/2007

Langsam Affidavit Exhibit 10

Wooldridge, Kelly J.

From: Stackpole, Peter [Peter.Stackpole@cincinnati-oh.gov]
Sent: Tuesday, June 26, 2007 5:00 PM
To: Jacobson, Barbara Bison
Subject: FW: Lotz/Hoog
Attachments: Lotz-Hoog Schedule.xls

Barbara,

Attached is a spreadsheet that shows Lotz and Hoog's work schedules from mid to late 2000 until May 13, 2006. (This is the best data available for their work schedules. The companies have no retention policies for desk diaries and E-23 does not have the desk diary for year 2000.) Each day that Hoog and Lotz worked will have anywhere from 10 to 20 plus runs. Each run is a separate medical run report and can only be searched through someone physically looking through microfiche or handling the document itself (if it is hardcopy). In total, Mose conservatively estimates that this would involve the review by hand of at least 16,000 documents (for both individuals combined). On top of that, the City would need some type of assurance that by tendering the records we are not violating any provisions of HIPAA. Again, not having looked at HIPAA in a very long while, please tell me if I am wrong and there is some obvious way to get around it. We could redact of course, but it seems to me that you need the medical information to determine if the person was similarly situated. And fyi, Mose informed me that up until recently there was no box on the form 33 to check for the person's race. Therefore, the vast majority of the form 33s may not even show if the patient was white or black. Even now that the form 33s have a box for the patient's race, the firefighters are not required to fill in that box and some do and some don't.

If it would help, I've asked Assistant Chief Demasi to be ready to explain to the Court why obtaining the information would be intensive and time consuming. But before we get to the mechanics of producing and copying the information that is available, I want to resolve the HIPAA questions so that I am satisfied I am not causing my client to violate any laws by responding to discovery.

Thanks,
Pete

From: DeMasi, Mose
Sent: Tuesday, June 26, 2007 11:39 AM
To: Stackpole, Peter
Subject: FW: Lotz/Hoog

From: Ware, Monique
Sent: Tuesday, June 26, 2007 11:27 AM
To: DeMasi, Mose
Cc: Jones, Will; Fossett, Mike
Subject: Lotz/Hoog

Attached are their work schedules from the As/400 from 2000 to May 13 2006. Anything after that date should be available in the CFDWEB.

Monique Ware

Cincinnati Fire Department

Computer Systems Analyst

(513)263-8051(w)

09/18/2007

(513)263-8095(fx)

09/18/2007

Langsam Affidavit Exhibit 11

Wooldridge, Kelly J.

From: Stackpole, Peter [Peter.Stackpole@cincinnati-oh.gov]
Sent: Tuesday, June 26, 2007 4:17 PM
To: Jacobson, Barbara Bison
Subject: FW: Race by Assignment
Attachments: race by assn.pdf

Racial composition of engine companies etc attached. This is document that was prepared internally. No one is aware of a "race study" that has been conducted by an outside group. I also have personnel files for Lotz and Hoog available for you.

Thanks,
Peter

From: DeMasi, Mose
Sent: Tuesday, June 26, 2007 4:12 PM
To: Stackpole, Peter
Subject: FW: Race by Assignment

Pete,

Here is the race/assignment information we discussed this morning.

Thanks,
Mose

From: Ware, Monique
Sent: Tuesday, June 26, 2007 2:01 PM
To: DeMasi, Mose
Cc: Fossett, Mike; Jones, Will
Subject: Race by Assignment

This is report is race by assignment. I've included a cross tab report in percentages and after that the counts are included. Let me know is you have any questions.

Monique

Monique Ware

Cincinnati Fire Department

Computer Systems Analyst

(513)263-8051(w)

(513)263-8095(fx)

09/18/2007

Langsam Affidavit Exhibit 12

Vorys, Sater, Seymour and Pease LLP

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June 27, 2007

VIA US MAIL AND EMAIL

Peter J. Stackpole, Esq.
City of Cincinnati Solicitor's Office
801 Plum Street, Room 214
Cincinnati, OH 45202

Re: Samuel v. Hoog

Dear Peter:

Thank you for providing the documents showing Firefighters Hoog's and Lotz's work schedules and the racial composition of members of the Fire Department by assignment. Is the racial composition by assignment current or as of May 2000? Also, you state that "no one is aware of a 'race study' that has been conducted by an outside group." Are there internal documents commenting on the racial makeup of the fire houses? Those would also fall within the scope of our request.

I am enclosing a list of documents produced as well as those still to be produced in response to the subpoena, updated to reflect the documents you produced yesterday (those documents are preceded by an asterisk). As you are aware, there are a number of categories of documents we still need to receive. We again ask you to produce them as soon as possible.

Sincerely,

Barbara B. Jacobson/DKL
Barbara Bison Jacobson

BBJ/dkl

Enclosure

Vorys, Sater, Seymour and Pease LLP

Peter J. Stackpole, Esq.
June 27, 2007
Page 2

cc: Kimberly A. Rutowski
Dorothea Langsam

**DOCUMENTS PRODUCED BY THE CITY OF CINCINNATI PURSUANT TO
SEPTEMBER 14, 2006 SUBPOENA**

Records of the Fire Department Internal Investigation Section's investigation of defendants Hoog's and Lotz's conduct during the events of May 29, 2000, including the Medical Run Report and Dispatch History for that response, summaries of interviews, record of hearing, prior commendation and disciplinary records, memoranda, report of findings, and notification of completion of training ordered.

Graph of defendants Hoog's and Lotz's work schedules, apparently for the year 2000, showing month, day, and assignment (e.g., Engine 23).

* Graph of defendants Hoog's and Lotz's work schedules, from late 2000 through May 13, 2006.

Assignment History Report for defendants Hoog and Lotz, showing date, rank, and location of permanent assignments.

Print-out of disciplinary incidents involving defendants Hoog and Lotz.

"Fire Department Responses to 1316 Burdett 1/1/94 through 6/28/04" listing date, incident number, dispatch code, and description of emergency.

"Address Inquiry – Incidents" for 1316 Burdett Ave., listing incident number, incident date (ranging from 8/16/98 through 1/24/05), alarm time, and nature of call (EMS or fire).

Daily Emergency Medical Services Company Reports and Medical Run Reports for some emergency response calls to 1316 Burdett Ave.

Excerpts from what appears to be a manual entitled *1st in the Nation* showing fire department addresses, resources, and statistics for such things as the total number of runs, fire runs, EMS runs, etc. by fire houses, engine, ladder, and ambulance companies for various years, and describing the EMS program.

Chart and graph showing race of Fire Department members by rank, apparently as of November 7, 2006.

* Chart showing race of Fire Department members by assignment (e.g., Engine 23), apparently as of June 27, 2007.

The Fire Department allowed plaintiffs' counsel to review and copy Internal Investigation files maintained for the period from approximately 2000 through 2006.

ADDITIONAL DOCUMENTS TO BE PRODUCED AS OF JUNE 27, 2007

With the exception of some Medical Run Reports and other emergency response documentation for emergency response calls to 1316 Burdett Ave.:

Medical Run Reports that identify defendants Hoog or Lotz by name or badge number for 5/29/99 through 7/29/00.

Medical Run Reports and other emergency response documentation, including "desk diaries," for 1/1/00 through 7/29/00 when defendant Hoog was on duty.

The remainder of the Medical Run Reports and other emergency response documentation for calls to 1316 Burdett Ave.

Medical Run Reports and other emergency response documentation for any other shift in which defendant Hoog acted as officer in charge.

Additional emergency response documentation for the May 29, 2000 event, including Forms 47, 273, and the back-side of the original Medical Run Report.

Drafts of the Internal Investigation reports and memoranda concerning defendants Hoog's and Lotz's conduct during the May 29, 2000 event.

Defendants Hoog's and Lotz's personnel files.

Documents related to the racial makeup of fire houses or engine companies, including a report addressing racial segregation and discrimination in the Fire Department.

A map of the geographic area primarily served by Engine 23, or a description of its boundaries.

Langsam Affidavit Exhibit 13

Vorys, Sater, Seymour and Pease LLP

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Barbara Blson Jacobson
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E-Mail: bbjacobson@vssp.com

August 8, 2007

VIA US MAIL AND EMAIL

Peter J. Stackpole, Esq.
City of Cincinnati Solicitor's Office
801 Plum Street, Room 214
Cincinnati, OH 45202

Re: Samuel v. Hoog

Dear Peter:

This letter will follow up on a few loose ends. First, when we spoke recently, you stated that you thought the City had already produced a map of the geographic area served by Engine 23 in 1999-2000. I have verified that the City has not produced such a map, and therefore request that you provide one to us by this Friday, August 10.

In addition, we still do not have the personnel files for Firefighters Hoog and Lotz. The additional documents you provided in June are related to this case and do not contain information such as hire dates, assignments, reviews, or training. We are willing to make arrangements again to pick up the complete personnel files (other than personal medical information) and would like to do so at the earliest opportunity. Please let us know when this will be possible.

Finally, in my June 27, 2007 letter to you, I remarked that you stated that "no one is aware of a 'race study' that has been conducted by an outside group" and I asked if there are internal documents commenting on the racial makeup of fire houses. I have not heard back from you in response to my question, so will clarify here that we request any documents on this subject, whether produced internally or externally.

Thank you for your prompt attention to these matters.

Vorys, Sater, Seymour and Pease LLP

Peter J. Stackpole, Esq.
August 8, 2007
Page 2

Sincerely,


Barbara Bison Jacobson

BBJ/lma

cc: Kimberly A. Rutowski
Dorothea Langsam

Langsam Affidavit Exhibit 14

Court Order
US District Court
Judge Michael R. Barrett

Order No.	Order	Assigned To	Date	Complete	Notes	Issues
1	Obtain a copy of all EMS run reports Mike Lotz made between May 29th 1999 and July 29th 2000		8/10/2007	8/21/2007	8/10/07 Tapes being replicated	
1	Obtain a copy of all EMS run reports Steve Hoog made between May 29th 1999 and July 29th 2000		8/10/2007	8/21/2007	8/10/07 Tapes being replicated	
2	Desk diary pages from 1/1/2000 to 7/29/2000 from when Hoog was on duty	Hornback	8/24/2007			UTO 1999 Records 2000 are at E-23
2	Obtain "other emergency response documentation" from 1/1/2000 already per A/C Demasi	Provided	8/20/07 per A/C Demasi			
3	Medical Run reports for when Hoog acted in charge?		8/21/2007			Hoog worked in charge during the three week time period preceding these dates, 7/24/99 12/11/99 7/22/00
3	CAD reports for runs where Hoog acted in charge	Cayse	8/27/2007	8/27/2007	Need to print these off of Moniques Email 8-9-07 These dates have been obtained	
3	Form 34's for when Hoog was on ambulance		8/10/2007	8/21/2007		
4	Obtain Form 47 Chiefs report from incident occurring on May 29th 2000	D/C Jones	DC Jones		Individual Personnel Files at 5th and Central	Internal does not have per Capt Ransick 8-10-07
4	Obtain Form 273 from incident occurring May 29th 2000	Capt Ransick to write statement stating it does not exist		8/21/2007	Written Statement Delivered in person by Capt Ransick 8-21-07	Internal does not have per Capt Ransick 8-10-07
4	Obtain run report from incident occurring May 29th 2000 specifically the back of the run report ONLY	Cayse	8/27/2007	8/27/2007	Need to obtain after Tapes came back	Internal does not have per Capt Ransick 8-10-07
5	List of all responses to the address of 1316 Burdett Avenue		8/27/2007	AS 400 records only		
5	F-33 EMS Run reports from same address for runs identified above		8/21/2007	EMS tapes provided		
5	F-902 Fire Run reports from same address for runs identified above	Monique Ware	8/27/2007			
6	Drafts of all internal investigation reports and memoranda concerning Defendants Hoog and Lotz conduct during the May 29th 2000 incident	Disregard	Internal	8/2/2007		
7	Firefighter Hoogs personnel File excluding medical info	Disregard	D/C Texter	8/2/2007		
7	Firefighter Lotzs personnel file excluding medical info	Disregard	D/C Texter	8/2/2007		
8	Documents related to the racial makeup of the fire house and engine companies	Disregard	A/C DeMasi	8/2/2007		
8	Investigate the existence of a report addressing racial discrimination and segregation in the fire department	Disregard	A/C DeMasi	8/2/2007		
9	A map of the geographic area served by Engine 23	Cayse	Long			
9	A description of engine 23's geographic running area boundaries	Cayse	Long			

Langsam Affidavit Exhibit 15

Work Schedule 5/29/1999 - 7/29/2000

Mike Lotz and Steve Hoog

Mike Lotz Thurs KD Badge 678			Steve Hoog Sun KD Badge 078		
Date	Company	In charge?	Date	Company	In Charge?
5/29/1999	E-8		5/29/1999	E-23	
6/1/1999	E-23		6/1/1999	E-23	
6/4/1999	E-3		6/4/1999	E-23	
6/7/1999	E-19		6/7/1999	E-23	
6/10/1999	KD		6/10/1999	E-23	
6/13/1999	Comp / E-23		6/13/1999	KD	
6/16/1999	E-23		6/16/1999	A-23	
6/19/1999	R-38		6/19/1999	E-23/L-23?	
6/22/1999	E-19		6/22/1999	E-23	
6/25/1999	E-8		6/25/1999	E-23	
6/28/1999	E-19		6/28/1999	E-23	
7/1/1999	KD		7/1/1999	E-23	
7/4/1999	E-23		7/4/1999	KD	In Charge
7/7/1999	R-46		7/7/1999	A-23	During Pay
7/10/1999	E-23		7/10/1999	SWP	Period
7/13/1999	E-23		7/13/1999	E-38/L-23?	Unkown
7/16/1999	E-23		7/16/1999	L-23/E-7?	which date
7/19/1999	E-23		7/19/1999	E-23	
7/25/1999	E-23		7/25/1999	KD	
7/28/1999	E-23		7/28/1999	E-46/L-32?	
7/31/1999	E-23		7/31/1999	E-23/E-31?	
8/3/1999	E-23		8/3/1999	A-23	
8/6/1999	E-19		8/6/1999	E-23	
8/9/1999	E-23		8/9/1999	E-23	
8/12/1999	KD		8/12/1999	E-23	
8/15/1999	E-23		8/15/1999	KD	
8/18/1999	E-51		8/18/1999	E-18	
8/21/1999	E-23		8/21/1999	Vac	
8/24/1999	E-19		8/24/1999	Hol	
8/27/1999	E-7		8/27/1999	Hol	
8/30/1999	E-23		8/30/1999	Hol	
9/2/1999	KD		9/2/1999	E-23	
9/5/1999	E-23		9/5/1999	KD	
9/8/1999	E-23		9/8/1999	E-23	
9/11/1999	Vac		9/11/1999	E-23	
9/14/1999	E-8		9/14/1999	E-23	
9/17/1999	R-46		9/17/1999	E-23	
9/20/1999	Hol		9/20/1999	SWP-F	
9/23/1999	KD		9/23/1999	A-23	
9/26/1999	Hol		9/26/1999	KD	
9/29/1999	E-23		9/29/1999	E-23	
10/2/1999	R-24		10/2/1999	E-23	
10/5/1999	E-23		10/5/1999	E-23	
10/8/1999	E-23		10/8/1999	A-23	
10/11/1999	E-17		10/11/1999	E-23	
10/14/1999	KD		10/14/1999	E-23	
10/17/1999	E-23		10/17/1999	KD	
10/20/1999	E-23		10/20/1999	E-46/T-24?	
10/23/1999	E-8		10/23/1999	E-23	
10/26/1999	E-23		10/26/1999	L-31/E-49?	
10/29/1999	E-8		10/29/1999	A-23	
11/1/1999	E-23/E-7?		11/1/1999	SWP	
11/4/1999	KD		11/4/1999	Hol	
11/7/1999	E-23		11/7/1999	KD	
11/10/1999	E-23		11/10/1999	Hol	
11/13/1999	E-8		11/13/1999	E-23	
11/16/1999	E-8		11/16/1999	E-23	
11/19/1999	E-19		11/19/1999	E-23	
11/22/1999	E-23		11/22/1999	E-23	In Charge
11/25/1999	E-23?		11/25/1999	A-23	During Pay
12/1/1999	E-23		12/1/1999	E-23	Period

Hoog Ambulance Dates		
Date	Company	Form 34
1/5/1999	A-23	
1/11/1999	A-23	
2/10/1999	A-23	
3/9/1999	A-12	
4/5/1999	A-23	
4/26/1999	A-19	
5/17/1999	A-23	
6/16/1999	A-23	
7/7/1999	A-23	
8/3/1999	A-23	
10/8/1999	A-23	
10/29/1999	A-23	
11/25/1999	A-23	
12/13/1999	A-23	
2/17/2000	A-23	
3/18/2000	A-23	
4/14/2000	A-23	
5/11/2000	A-23	
6/7/2000	A-23	
7/7/2000	A-23	

Indicates Pay Period Range

12/7/1999	E-23	12/7/1999	E-23	which date
12/10/1999	E-23	12/10/1999	E-23	
12/13/1999	E-23	12/13/1999	A-23	
12/16/1999	KD	12/16/1999	E-23	
12/22/1999	E-23	12/22/1999	E-23	
12/25/1999	E-23	12/25/1999	E-23	
12/28/1999	E-8	12/28/1999	SWP-M	
12/28/1999	E-8	12/28/1999	SWP-M	
12/31/1999	E-23	12/31/1999	SWP-M	
1/3/2000	E-23	1/3/2000	Hol	
1/6/2000	KD	1/6/2000	Hol	
1/9/2000	E-23	1/9/2000	KD	
1/12/2000	E-23	1/12/2000	Hol	
1/15/2000	E-23	1/15/2000	Hol	
1/18/2000	E-23	1/18/2000	Vac	
1/21/2000	E-23	1/21/2000	Vac	
1/24/2000	E-23	1/24/2000	Vac	
1/27/2000	KD	1/27/2000	Vac	
1/30/2000	E-19	1/30/2000	KD	
2/2/2000	E-23	2/2/2000	Vac	
2/5/2000	E-23	2/5/2000	Vac	
2/8/2000	E-23 E-38?	2/8/2000	E-23	
2/11/2000	E-23	2/11/2000	E-23	
2/14/2000	E-19	2/14/2000	E-23	
2/17/2000	KD	2/17/2000	A-23	
2/20/2000	E-23	2/20/2000	KD	
2/23/2000	E-23	2/23/2000	E-23	
2/26/2000	E-23	2/26/2000	E-23	
2/29/2000	E-8	2/29/2000	E-23	
3/3/2000	R-46	3/3/2000	E-23	
3/6/2000	E-23	3/6/2000	Vac	
3/9/2000	KD	3/9/2000	Vac	
3/12/2000	E-23	3/12/2000	KD	
3/15/2000	E-23	3/15/2000	E-23	
3/18/2000	E-23	3/18/2000	A-23	
3/21/2000	E-23	3/21/2000	E-23	
3/24/2000	E-19	3/24/2000	E-23	
3/27/2000	E-23	3/27/2000	L-23	
3/30/2000	KD	3/30/2000	E-23	
4/2/2000	E-19	4/2/2000	KD	
4/5/2000	E-23	4/5/2000	E-23	
4/8/2000	E-23	4/8/2000	Trade	
4/11/2000	E-23	4/11/2000	E-23	
4/14/2000	E-23	4/14/2000	A-23	
4/17/2000	E-23	4/17/2000	E-23 L-32?	
4/20/2000	KD	4/20/2000	E-23	
4/23/2000	E-23	4/23/2000	KD	
4/26/2000	E-23	4/26/2000	E-23	
4/29/2000	E-23	4/29/2000	E-23	
5/2/2000	E-23 L-23?	5/2/2000	E-23 L-23?	
5/5/2000	E-23	5/5/2000	E-23 L-31?	
5/8/2000	E-19	5/8/2000	E-23	
5/11/2000	KD	5/11/2000	A-23	
5/14/2000	E-23	5/14/2000	KD	
5/17/2000	E-23	5/17/2000	E-23	
5/20/2000	E-23	5/20/2000	L-29	
5/23/2000	R-24	5/23/2000	E-23	
5/26/2000	E-23	5/26/2000	E-23	
5/29/2000	E-23	5/29/2000	E-23	
6/1/2000	KD	6/1/2000	E-23	
6/4/2000	E-23	6/4/2000	KD	
6/7/2000	E-23	6/7/2000	A-23	
6/10/2000	E-23	6/10/2000	E-23	
6/13/2000	E-3	6/13/2000	E-23	
6/16/2000	E-23	6/16/2000	E-23	
6/19/2000	E-23	6/19/2000	E-23	
6/22/2000	KD	6/22/2000	E-23	

6/28/2000 E-23
7/1/2000 Comp
7/4/2000 R-46
7/7/2000 E-2
7/10/2000 E-23
7/13/2000 KD
7/16/2000 E-23
7/19/2000 R-46
7/22/2000 E-23
7/25/2000 E-8
7/28/2000 E-23
7/31/2000 E-23

6/28/2000 E-23
7/1/2000 E-23

7/4/2000	E-23	
7/7/2000	A-23	In Charge
7/10/2000	E-23?	During Pay
7/13/2000	E-23	Period -
7/16/2000	KD	Unkown
7/19/2000	E-23	which date
7/22/2000	E-23	
7/25/2000	E-23	
7/28/2000	E-23	E-46?
7/31/2000	E-23	